

RICK S. COWLE, ESQ.
THE LAW OFFICE OF RICK S. COWLE, P.C.
Prior Attorney for the Debtor
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION

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In Re:

CREATIVE LEARNING SYSTEMS, LLC
dba THE GODDARD SCHOOL

Chapter 11

Case No. 18-23814

Debtor.

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**APPLICATION FOR ALLOWANCE OF ADDITIONAL COMPENSATION TO PRIOR
ATTORNEY FOR DEBTOR UNDER 11 U.S.C. §330 AND RULE
2016 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

**TO: THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE:**

The application of RICK S. COWLE, Esq. of THE LAW OFFICE OF RICK S. COWLE, P.C., prior attorney for the Debtor, respectfully represents:

1. On November 26, 2018, Creative Learning Systems LLC dba the Goddard School, (“Debtor”) filed a petition for relief under Chapter 11 of the United States Bankruptcy Code (the “Petition”) in the Southern District of New York, White Plains Division.
2. The undersigned was counsel for the Debtor from the date of the Petition filing until April 17, 2019 when counsel was replaced by Bronson Law Offices PC. *See* Orders for the Retention of Debtor’s Counsel, ECF Nos. 19 & 54 attached hereto as Exhibit A).
3. The Court has jurisdiction to hear this Application pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicate for the relief sought herein is 11 U.S.C. § 330.

4. This application is made by the Law Office of Rick S. Cowle, PC for an allowance of compensation for professional services rendered to and on behalf of the Debtor during the period beginning November 26, 2018 and ending April 12, 2019 for professional services and for reimbursement of actual and necessary costs and expenses incurred in connection with said services.

5. All of the services for which compensation is herein sought were rendered to the Debtor in connection with this case and in furtherance of the duties and functions of counsel to a bankruptcy debtor.

6. The Law Office seeks allowance of \$3,467.25 for services rendered during the Application Period and seeks reimbursement of expenses and disbursements in the amount of \$31.00 for its actual and necessary costs and expenses incurred during the Application Period for a total amount being sought of \$3,498.25 after application of the retainer of \$14,500.00. The documentation reflecting the services performed and the time expense by each professional during the Application Period and the documentation reflecting the disbursements during the Application Period is annexed hereto as Exhibit B.

7. A non-exhaustive description of the services rendered by the Law Office to the Debtor during the Application Period as set forth in Exhibit B includes the following:

- a. Preparation of the Chapter 11 Petition and First Day Motions;
- b. Chapter 11 case administration;
- c. Preparation of retention order and application for counsel
- d. Appearance the Section 341(a) meeting
- e. Preparation of application to employ broker
- f. Telephone conferences and conferences with the Debtor;

g. Negotiations regarding potential transfer of business.

8. In summation, the Law Office provided regular bankruptcy counsel and guidance to the Debtor regarding all aspects of the within proceeding and protected the Debtor's interest wherever necessary until counsel was substituted on April 17, 2019 pursuant to the Retention Order (Exhibit A).

9. As indicated, annexed Exhibit B represents the Law Office's itemization of the services performed by the employees of the Law Office during the Application Period. As reflected in Exhibit B, the Law Office has devoted 29.60 hours of senior – attorney time, 12.30 hours of associate time and 3.90 hours of legal assistant time having a value of \$16,250.25 at the firm's customary billing rates and represent an hourly rate of \$385.00 for the senior attorney, \$325.00 for the associate and \$195.00 for legal assistants. *See* Retainer Agreement attached as Exhibit C. Specific data regarding the attorney or legal assistant involved, the time spent and the normal billing rates is detailed in Exhibit B

10. The Law Office further notes that as reflected in Exhibit B, it has incurred \$1748.00 in out-of-pocket expenses including the Ch. 11 filing fee.

11. The Law Office has received a retainer of \$14,500.00 toward fees and expenses, thus the Law Office seeks \$3,467.25 in fees and \$31.00 in disbursements over and above this amount.

12. It is requested that the form and manner of notice be approved.

13. An Order authorizing the Employment and retention of the Law Office of Rick S. Cowle, P.C. was approved and entered under Docket no. 19 on January 8, 2019. (Exhibit A).

WHEREFORE, the Law Office of Rick S. Cowle, P.C. respectfully requests that the Court enter an Order under 11 U.S.C. Section 330 allowing compensation in the amount of \$3,467.25 in fees together with the reimbursement of its out-of-pocket expense of \$31.00 for a total sum of \$3,498.25 and granting such other and further relief as to the Court may deem just and proper.

Dated: Carmel, New York
June 25, 2019

THE LAW OFFICE OF RICK S. COWLE, P.C.

By: /s/ Rick S. Cowle
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